

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	IB Docket No. 17-16
Waiver of Part 25 Licensing Requirement)	
For Receive-Only Earth Stations Operating with)	
The Galileo Radionavigation-Satellite Service)	

**COMMENTS OF
TOPCON POSITIONING SYSTEMS, INC.**

Topcon Positioning Systems, Inc. (Topcon), through counsel and pursuant to 47 C.F.R. § 1.415, files these Comments in response to the Public Notice issued on January 6, 2017 (DA 17-18), requesting comment on the European Commission’s (EC) request, submitted by the National Telecommunications and Information Administration (NTIA), for a waiver of the Commission’s licensing requirements to permit non-Federal receive-only earth stations within the United States to operate with signals of the Galileo Radionavigation-Satellite (RNSS) system.

Topcon is a leading provider of high-precision Global Position System (GPS) devices, including devices for use in surveying, construction, agriculture, civil engineering, and mapping. Topcon’s high-precision devices are distinguishable from general location and navigation devices used by the average American consumer. The industries served by Topcon possess an enhanced need for positioning accuracy, requiring more sophisticated devices.

Topcon supports the EC’s request for waiver of the Commission’s licensing requirements. Granting the requested waiver will accelerate access to the Galileo RNSS system in the United States and promote interoperability and compatibility. Topcon agrees with the NTIA’s comments, and the Commission’s conclusion, that allowing GPS device manufacturers to utilize the positioning, navigation, and timing (PNT) services of Galileo to supplement

existing GPS signals will bring significant benefits to the American public by improving the availability, reliability, and resiliency of space-based PNT services.

In particular, Topcon believes that Galileo can serve as a complement to existing GPS by allowing devices to use both services in a coordinated fashion, an opportunity that offers particular advantages for high-precision devices, such as those manufactured by Topcon. Given the ever-increasing reliance on GPS devices by consumers and businesses in the United States, the ability to obtain access to the Galileo systems, without the cost and delays of licensing, can benefit consumers in the event that GPS services become temporarily unavailable. Indeed, given that testing and unplanned service disruptions do occasionally cause loss of GPS services, the ability to double source PNT information provides device manufacturers with a unique and important opportunity to mitigate disruption of high-precision devices.

For these reasons, Topcon supports the EC's waiver request and appreciates the Commission's efforts to address and resolve the request in a timely fashion.

Dated: February 21, 2017

/s/ G. David Carter

G. David Carter
INNOVISTA LAW PLLC
1825 K Street, NW
Suite 508
Washington, DC 20006
(202) 750-3502
(202) 750-3503 (fax)
david.carter@innovistalaw.com